

From: [John Hannon](#)
To: [Paul Argyropoulos](#)
Cc: [Karen Laughlin](#); [Karl Simon](#); [Meg McCarthy](#); [Paul Machiele](#); [Robert Larson](#); [Roland Dubois](#)
Subject: Re: Fw: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination
Date: 10/07/2009 08:15 AM

I only looked at the beginning of part "i. Planted Crops and Crop Residue from Agricultural Land", and did not want to jump in just briefly. The following statement doesn't seem to catch what we need to find:

Through extensive discussions with USDA staff experts and careful analysis of publically available USDA and USGS satellite and land use data, EPA is able to make the finding that, in the aggregate, the amount of agricultural land currently available in the United States for renewable biomass production is sufficient to support EISA renewable fuel obligations and other foreseeable demands for crop products. , at least in the near term, without clearing and cultivating additional land. Thus, EPA is implementing an aggregate compliance approach for feedstock verification in the production of renewable fuel made from renewable biomass that is made from planted crops and crop residue from agricultural land.

Redacted

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▼ [Paul Argyropoulos---10/06/2009 01:15:21 PM---My quick reactions / responses / comments to Roland's comments. Let's keep this action moving. Oth](#)

From: Paul Argyropoulos/DC/USEPA/US
To: Meg McCarthy/DC/USEPA/US@EPA, Roland Dubois/DC/USEPA/US@EPA, John Hannon/DC/USEPA/US@EPA
Cc: Karen Laughlin/DC/USEPA/US@EPA, Karl Simon/DC/USEPA/US@EPA, Paul Machiele/AA/USEPA/US@EPA, Robert Larson/AA/USEPA/US@EPA

Date: 10/06/2009 01:15 PM

Subject: Re: Fw: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination

My quick reactions / responses / comments to Roland's comments.
Let's keep this action moving. Others add to if you have time.

[attachment "RFS2 -aggregate preamble RD 10-2 - pa.doc" deleted by John Hannon/DC/USEPA/US]

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▼ Meg McCarthy---10/06/2009 11:59:10 AM---Some comments and questions from Roland on the draft aggregate approach preamble. ----- Forwarded by

From: Meg McCarthy/DC/USEPA/US

To: Paul Argyropoulos/DC/USEPA/US@EPA, Paul Machiele/AA/USEPA/US@EPA, Karl Simon/DC/USEPA/US@EPA, Karen Laughlin/DC/USEPA/US@EPA, Robert Larson/AA/USEPA/US@EPA

Date: 10/06/2009 11:59 AM

Subject: Fw: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination

Some comments and questions from Roland on the draft aggregate approach preamble.

----- Forwarded by Meg McCarthy/DC/USEPA/US on 10/06/2009 11:48 AM -----

From: Roland Dubois/DC/USEPA/US

To: Meg McCarthy/DC/USEPA/US@EPA

Date: 10/02/2009 04:47 PM

Subject: Re: Fw: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination

Meg, attached are some comments based on a quick read. As Paul's note to USDA acknowledges, we are going to need to add a lot of discussion of the USDA data once we have it. I have a lot of questions

about the survey plan option, as you will see in the attached. Roland

[attachment "RFS2 -aggregate preamble RD 10-2.doc" deleted by Paul Argyropoulos/DC/USEPA/US]

▼ Fw: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / acc...

Fw: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination

Meg
McCarthy to: Roland Dubois

10/02/2009
01:41 PM

It's probably easier to understand when I include the attachment!!!

----- Forwarded by Meg McCarthy/DC/USEPA/US on 10/02/2009 01:41 PM -----

From: Paul Argyropoulos/DC/USEPA/US
To: HBAUMES@oce.usda.gov, jglauber@oce.usda.gov
Cc: Meg McCarthy/DC/USEPA/US@EPA, Laughlin.Karen@epamail.epa.gov, Robert Larson/AA/USEPA/US@EPA, Vincent Camobreco/DC/USEPA/US@EPA, dunham.sarah@epa.gov, simon.karl@epa.gov, Paul Machiele/AA/USEPA/US@EPA
Date: 10/02/2009 12:34 PM
Subject: EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination

Hi Harry,

As noted in our previous communications, we are moving quickly to our next steps in coordinating with you and your team with regard to revising our RFS2 package to account for applying modified provisions for the renewable biomass compliance program.

First, I have attached our draft preamble language which is our first step in developing language to frame and support the concept of the aggregate compliance approach. Please review /distribute to your team for a prompt review and provide us with your comments ASAP (by Wednesday noon latest). Meg has included some call out balloons in certain areas where we are requesting specific input from your team, including descriptions of the data, how the data can / will be used etc.

in defending this approach. These are critical areas. We are of course seeking input on the full draft as well. Meg McCarthy is lead on this section with support from a number of us.

We are also getting ready to initiate direct engagement on the data sets which we are looking to use to support building our case / defense for the aggregate approach and specifically the number / numbers. Our intention is come up with a number and potentially application of a defensible formula - or a set of regional numbers which will act as the crop land threshold(s). We have three options / approaches generally noted in the draft attachment that we'll need to discuss. We'll of course need prompt support on this as well because these number will then need to go into the language and be bound by appropriate descriptors. Karen Laughlin is leading our coordination on these discussions with support from the rest of us.

The lions share of all this work needs to be done over the course of the next 2 weeks -- so we appreciate your teams time and attention to all this.

Please let me know if you have any questions. We'll likely need a quick committee check-in call in the very near future to handle some of this in real time. I'll look to see where things are by mid-week and then look to schedule something after gauging our progress.

Thanks, Paul

[attachment "Renewable Biomass Implementation Approaches Preamble 10-2-09 pa.doc" deleted by Paul Argyropoulos/DC/USEPA/US]

Best, Paul

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